

EXHIBIT 1

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1 Jorge Alejandro Rojas
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3 Plaintiff in Pro Se
4 557 Cambridge Way
5 Bolingbrook, IL 60440
6 424-219-1582
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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
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11 JORGE ALEJANDRO ROJAS,
12 Plaintiff,
13 v.
14 UNPLUGGED MEDIA, LLC, et al,
15 Defendants.
16
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Case No. 2:23-cv-02667-SPG-KS


**DECLARATION OF JORGE
ALEJANDRO ROJAS IN SUPPORT
OF REQUEST FOR ELECTRONIC
APPEARANCE VIA ZOOM**

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19 I, Jorge Alejandro Rojas, an adult of sound mind, declare as follows:

- 20 1. I am the Plaintiff in this case, and make the following statements based on my
21 personal knowledge and records. If called to testify concerning any of these
22 statements, I will be able to do so.
- 23 2. I make the statements in this declaration in support of Plaintiff's Request for
24 Electronic Appearance via Zoom.
- 25 3. I am an employed as an Air Traffic Control Specialist, with the Federal Aviation
26 Administration, and have been assigned to the Chicago Air Route Traffic Control
27 Center, located in Aurora, IL, since approximately September 2018.
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- 1 4. My work schedule primarily consists of one day off a week, typically Thursdays,
2 and I work approximately 48-55 hours per week, with a schedule that varies between
3 working morning, afternoon, and evening shifts.
- 4 5. My current schedule for the week of the hearing would necessitate that I miss at least
5 one, and possibly two days of work to attend the hearing in person, as I would travel
6 from Chicago, Illinois. If I were to attend the hearing virtually the period which I
7 miss would be shorter as I would not need to travel as well as be more economical
8 because I would not need to purchase air fare.
- 9 6. When communicating with Defendant Bykhovsky concerning the entry of default
10 against his company, Unplugged Media, LLC, he stated in response "I am in
11 Panama. It is logistically impossible for me to address this until/unless I move back
12 to the United States."
- 13 7. I believe that attending the hearing virtually via Zoom would allow me, and possibly
14 Mr. Bykhovsky if he chooses to attend, the ability to answer any questions or
15 concerns the Court has at oral argument concerning the pending motion. I am
16 unaware of Mr. Bykhovsky intending to attend, and I am unaware of any filing filed
17 by him in opposition to the pending motion.

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19 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true
20 and correct. Executed on December 1, 2023, in Bolingbrook, IL.

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23 _____
24 Jorge Alejandro Rojas
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